

FILED  
LODGED  
RECEIVED

FEB 16 2007

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
02/16/07

IN THE UNITED STATES COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

**GALVIN REALTY LAW GROUP, a**  
Washington professional services  
corporation,

Plaintiffs,

v.

**MICHAEL SHANKS, PATRICIA HUTTON,**  
and **THE UNITED STATES OF AMERICA,**

Defendants.

**THE UNITED STATES OF AMERICA,**

Intervenor Defendant and  
Cross-Complainant,

v.

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

Cross-Defendant.

**CIVIL DOCKET FOR CASE #:**  
**2:07-cv-00121-JLR**

**Snohomish County Superior Court,**  
**06-00002-09718-0**

**Motion of Attorney for Defendant**  
**Patricia Hutton to Withdraw**

**NOTE ON MOTION CALENDAR:**

**March 06, 2007 without oral**  
**argument**



**07-CV-00121-M**

Motion to Withdraw

Page 1 of 3

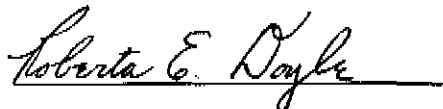
LAW OFFICE OF  
**ROBERTA E. DOYLE**  
9709 Third Avenue NE  
Northgate Plaza Bldg \* Suite 504  
Seattle, Washington 98105  
(206) 525-9934

1  
2  
3 Comes now Roberta E. Doyle, attorney in the Snohomish County Superior Court  
4 for Defendant Patricia Hutton, and moves the court, under GR 2(g)(4)(A), for leave to  
5 withdraw as Ms. Hutton's attorney now that this matter has been removed to the U.S.  
6 District Court for the Western District of Washington. I have been in the practice of law  
7 for 29 years, but my practice has been confined to Domestic Relations law, in the  
8 Superior Courts of the State of Washington. When I undertook to represent Ms. Hutton,  
9 her legal needs were well within my area of expertise. The case has now expanded to  
10 include issues of Federal Tax Liens to be litigated in the Federal Court, and I cannot  
11 properly represent Ms. Hutton's interests under the current posture of this case.

12  
13 I retained a qualified tax counsel to review the facts and circumstances of the  
14 subject tax liens in this case, as they pertain to Ms. Hutton, and Ms. Hutton will be  
15 supplied with the results of tax counsel's discovery. I have also provided Ms. Hutton with  
16 the name of an attorney known to me to be experienced in the procedures of the Federal  
17 Court, and willing to take her case if she chooses to employ him.

18  
19 Respectfully submitted this 14<sup>th</sup> day of February, 2007.

20  
21 Law Office of Roberta E. Doyle

22  
23 

24 Roberta E. Doyle, WSBA# 7613  
25 Attorney for Defendant Patricia Hutton

Motion to Withdraw

Page 2 of 3

LAW OFFICE OF  
ROBERTA E. DOYLE  
9709 Third Avenue NE  
Northgate Plaza Bldg \* Suite 504  
Seattle, Washington 98115  
(206) 525-9934

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of this **Motion of Attorney for Defendant Patricia Hutton to Withdraw and Order on Motion of Attorney for Defendant Patricia Hutton to Withdraw** has been made this 14<sup>th</sup> day of February, 2007, by United States' Mail to:

Patricia A. Hutton  
1149 Insco Loop  
Blacklick, OH 43004

Erin B. Ashwell, Atty., Tax Div.  
555 4th Street NW  
Rm. 7907 B  
Washington, DC 20001-2733

I HEREBY FURTHER CERTIFY that service of this **Motion of Attorney for Defendant Patricia Hutton to Withdraw and Order on Motion of Attorney for Defendant Patricia Hutton to Withdraw** has been made this 14<sup>th</sup> day of February, 2007, by legal messenger services to:

James J. Jameson, P.S.  
3409 McDougall Ave, Suite 201  
Everett, WA 98201  
(Attorney for Defendant Michael Shanks)

Dale J. Galvin  
Galvin Realty Group, P.S.  
21907 - 64<sup>th</sup> Avenue West, Suite 360  
Mountain Lake Terrace, WA 98043  
(Attorney for Plaintiff)



Marc Rudolf Remenar

Paralegal to Ms. Roberta E. Doyle, Atty for Ms. Hutton

Motion to Withdraw

Page 3 of 3

LAW OFFICE OF  
**ROBERTA E. DOYLE**  
9709 Third Avenue NE  
Northgate Plaza Bldg \* Suite 504  
Seattle, Washington 98115  
(206) 525-9934